

**REMARKS****I. Status of the Application**

A final Office Action was mailed in June 6, 2006. In response to the final Office Action, Applicants timely submit this Preliminary Amendment together with a Request for Continued Examination and with a Request for a One-Month Extension of Time.

Claims 1, 4, 6 - 9, 40, 43 - 49, 52, 54 - 57, 88, 91 - 98, 103 - 161, 164 - 181, 184 - 194, 201 - 205 and 208 - 215 are presently pending, with claims 2, 3, 5, 10 - 39, 41, 42, 50, 51, 53, 58 - 87, 89, 90, 99 - 102, 162, 163, 182, 183, 195 - 200, 206 and 207 having been previously canceled. With the present Response, Applicants amend claims 1, 7, 8, 98, 111, 112, 115, 118, 131, 141, 143, 146, 147, 155, 170, 171, 176, 177, 186, 190, 192 - 194, 202 and 203, and add new claims 216 - 200. No new matter is introduced. Support for the amendments may be found, for example, in Applicants' specification at page 5, line 14 through page 9 line 2, with reference to Applicants' FIGs. 5, 6A - 6C and 7.

Applicants also cancel claims 4, 9, 40, 43 - 49, 52, 54 - 57, 88, 91 - 97, 103 - 110, 113, 114, 116, 117, 119 - 130, 132 - 140, 142, 145, 148 - 154, 156 - 161, 164 - 169, 172 - 175, 179 - 181, 184, 185, 187 - 189, 191, 201, 204, 205, and 208 - 215 without prejudice or disclaimer.

**II. Claim Rejections under 35 U.S.C. § 103**

Claims 1, 4, 40, 43 - 45, 49, 52, 88, 91, 92, 97, 98, 103 - 128, 132 - 147, 149 - 154, 156 - 158, 172, 176 - 189, 194 - 197, 199 and 201 - 208 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S.. Patent No. 6,026,148 to Dworkin et al. ("Dworkin") in view of U.S. Patent No. 5,819,267 to Uyama. Claims 6, 7, 46, 54, 55, 93, 94, 129 - 131, 148, 174, 175, 192, 193, 198, and 200 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Dworkin in view of Uyama and U.S. Patent No. 6,505,166 to Stephanou ("Stephanou"). Claims 8, 9, 47, 48, 56, 57, 95,

96, 155, 169 - 171, 173, 190 and 191 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Dworkin in view of Uyama and U.S. Patent No. 5,863,223 to Walker et al. (“Walker”).

Claims 4, 6, 9, 40, 43 - 49, 52, 54 - 57, 88, 91 - 97, 103 - 110, 113, 114, 116, 117, 119 - 130, 132 - 140, 142, 145, 148 - 154, 156 - 169, 172 - 175, 179 - 185, 187 - 189, 191, 195 - 201 and 204 - 208 are canceled without prejudice or disclaimer, thereby rendering the rejections as to these claims moot. Applicants amend claims 1, 7, 8, 98, 111, 112, 115, 118, 131, 141, 143, 146, 147, 155, 170, 171, 176, 177, 186, 190, 192 - 194, 202 and 203, and traverse the rejections of claims 1, 7, 8, 98, 111, 112, 115, 118, 131, 141, 143, 144, 146, 147, 155, 170, 171, 176, 177, 178, 186, 190, 192 - 194, 202 and 203.

Independent claims 1, 98, 141, 176 and 194 are each rejected as being unpatentable over Dworkin in view of Uyama. In amended independent claim 1, Applicants claim:

1. A method executed by a server for enabling an expert to provide answers to questions received by the server from users in communication with a client interface, the client interface being identified to the users as a forum on a predetermined subject matter of the forum, the forum enabling users to direct questions to be answered to one or more of a plurality of experts represented as serving the forum, and the server being in communication with the client interface the method comprising the steps of:

receiving at the server at least a first question directed to a first expert in the plurality of experts;

receiving at the server at least a second question representing one of (a) a question directed to the plurality of experts serving the forum, or (b) a question referred to the first expert by at least another expert in the plurality of experts;

receiving at the server a request by the first expert to access a personal expert interface, the personal expert interface being uniquely associated with the first expert;

the server providing the first expert with access to the at least one first question and the at least one second question upon generation of the personal expert interface, wherein the personal expert interface presents the at least one first

question in a first grouping of questions directed to the first expert, and presents the at least one second question in a second grouping of questions directed either to the plurality of experts serving the forum, or directed to the first expert by the at least other expert in the plurality of experts.

(Emphasis added)

Dworkin discloses a computer-based system that facilitates an exchange of information between users and expert respondents (see, e.g., abstract of Dworkin). Like Applicant's method as claimed in amended independent claim 1, the system of Dworkin provides a client interface that enables users to present questions to experts (see FIGs. 3 - 6 of Dworkin). Dworkin also provides an expert interface that allows an expert to retrieve a list of user questions not yet answered through the use of telephone and facsimile device (see, e.g., Col. 6: 10 - 22 of Dworkin).

In sharp contrast to Applicants' claimed invention, however, Dworkin fails to teach or suggest that the list of questions retrieved by an expert in Dworkin's system provides the questions to be answered in a plurality of groupings including one grouping of questions specifically directed to the expert by users, and at least one other distinct grouping of questions (for example, of questions directed generally by users to the forum or questions specifically redirected to the expert by other experts). This feature of Applicant's claimed invention, for example, enables the experts to easily select questions of different type which may have differing priorities or urgencies (e.g., questions specifically directed to an expert may have a greater priority than questions generally directed to the forum).

Uyama discloses a know-how management apparatus that enables a user who is dissatisfied with information provided in a knowledge base to identify an expert consultant for additional assistance, and to transmit a question requesting additional assistance to the consultant (see, e.g., abstract of Uyama). Uyama's apparatus includes a questioning/answering means by which expert consultants can retrieve questions that are specifically directed to them by users (see, e.g., Col. 12: 37 - 46 of Uyama).

However, like Dworkin, and in sharp contrast to Applicants' claimed invention, Uyama provides no teaching or suggestion that the questioning/answering means provides questions in a plurality of groupings including at least one grouping of questions not specifically directed to the expert consultants by the users. Walker and Stephanou, which are directed to systems for automatically matching and assigning experts to user requests for assistance, similarly fail to disclose this claimed grouping feature of Applicant's invention.

Accordingly, Applicants respectfully submit that amended independent claim 1 is not made obvious by any combination of the cited references, and stands in condition for allowance. As claim 8 depends from allowable independent claim 1, Applicants further submit that dependent claim 8 is also allowable for at least this reason.

In amended independent claim 98, Applicants claim:

**98.** A system executed by a server for providing a plurality of answers from an expert to a plurality of questions posed by a plurality of users, the users communicating with the server via a plurality of client interfaces, each of the client interfaces being identified to the users as a forum on a predetermined subject matter of the forum and as presenting the expert as an expert on the subject matter, the system comprising:

a question receiving component configured to receive one of the plurality of questions at the server, the one question being directed to the expert from a user via one of the client interfaces;

a routing component configured to display the received question with other questions directed to the expert on a personal expert interface, wherein the personal expert interface is uniquely associated with the expert;

a command receiving and executing component configured to receive one or more commands from the expert together with an answer to the question, and to post the answer to the question, wherein the one or more commands provide that the answer to the question will be posted in two or more of the plurality of forums.

(Emphasis added)

As noted above, Dworkin discloses a system that allows users to submit questions to be answered by an expert, and allows the expert to post answers to these questions. Unlike Applicant's claimed invention, however, the system of Dworkin corresponds to a single forum as defined by Applicant ("enabling users to present questions and to view questions and answers relating to the predetermined subject matter"), and fails to teach or suggest the elements of Applicants' claimed invention that provide for the posting of answers to two or more different forums. In addition, none of the other cited references teach or suggest this claimed feature.

The Examiner asserts that Dworkin does in fact teaches a method allowing users to submit questions to an expert via different forums, suggesting that each distinct web page in Dworkin's system (for example, as illustrated by Dworkin's FIGs. 7, 8 and 9) constitutes a distinct forum. As this position is at odds with both Applicants' and Dworkin's disclosed definitions for forums, Applicants respectfully disagree.

Applicants define a forum as a device "enabling users to present questions and to view questions and answers relating to [a] predetermined subject matter of the forum." (see, e.g., Applicants' claim 1). Similarly, Dworkin compares a forum to a "computerized bulletin board [], in which users post technical questions, and in which those questions may be answered by one or more expert respondents, and/or by other users." (see, e.g., Col. 3: 3 - 7 of Dworkin). With reference to FIG. 3, Dworkin illustrates a "Medical Expert's Group Forum" providing expert information relating to for example the medical field.. This example by Dworkin is clearly congruent with Applicants' definition of a forum.

In sharp contrast to Applicants' invention as claimed in amended independent claim 98, Dworkin nowhere discloses or suggests a system in which the expert is provided with a personal expert interface that facilitates communication with more than one forum. For example, the web pages illustrated by FIGs. 8 and 9 of Dworkin are each accessed from the web page of FIG. 7, which includes a button for returning to the "forum home page." Clearly, according to each of Applicants' and Dworkin's apparent definitions, all of the web pages illustrated by FIGs. 7 - 9 are in fact part of a single forum.

Applicants submit that neither Dworkin, nor any of the other cited references, teach or suggest a question/answer system in which the expert is provided with a means for posting answers in more than one forum. Accordingly, Applicants respectfully submit that amended independent claim 98 is not made obvious by any combination of the cited references, and stands in condition for allowance. As claims 111, 112, 115 and 118 each depend from allowable independent claim 98, Applicants further submit that dependent claims 111, 112, 115 and 118 are also allowable for at least this reason.

In amended independent claim 141, Applicants claim:

**141.** A personal expert interface in communication with a server, the personal expert interface enabling a plurality of users and a plurality of experts to communicate a plurality of questions to a first expert in the plurality of experts via the server, in order to obtain answers from the first expert, the personal expert interface comprising

a web page uniquely associated with the first expert, the web page presents a plurality of groupings of questions to be answered to first expert, wherein the plurality of groups presented to the first expert includes a first group of questions directed to the expert via the server by the plurality of users, and a second group of questions directed to the first expert by others of the plurality of experts on referral, the referred questions having previously been directed to the other experts by ones of the plurality of users,

wherein the web page include a selectable command for posting an answer to at least one of the questions selected from at least one of the plurality of groupings, the at least one question being posted on one or more of a plurality of other web page accessible to the plurality of users.

(Emphasis added)

Applicants submit that neither Dworkin nor any of the other cited references, either alone or in combination, teach or suggest Applicants' personal expert interface as claimed in amended independent claim 141. Specifically, and as previously argued with reference to amended independent claim 1, the cited references fail to teach or suggest a personal expert interface that presents questions to be answered by an identified expert in a plurality of groupings including one grouping of questions specifically directed to the

expert by users, and at least one other distinct grouping of questions. Moreover, and with specific reference to amended independent claim 141, none of the cited references teach or suggest that the other distinct grouping may include questions directed to the first expert by others of the plurality of experts on referral.

Stephanou discloses a system “for assigning an expert to a request for assistance.” (see, e.g., abstract of Stephanou) The system of Stephanou implements an automated expert referral process based on cumulative user rankings of the experts (Col 1: 64 - Col 2: 8). Unlike the present invention as claimed in amended independent claim 141, however, Stephanou fails to suggest or disclose a personal expert interface by which an expert can receive a question directly referred to one expert by another expert who earlier received the question from a user. Applicants submit that none of the other cited references teach or suggest this feature of Applicants’ amended independent claim 141.

Accordingly, Applicants respectfully submit that amended independent claim 141 is not made obvious by any combination of the cited references, and stands in condition for allowance. As claims 143, 144, 146 and 147 each depend from allowable independent claim 141, Applicants further submit that dependent claims 143, 144, 146 and 147 are also allowable for at least this reason.

In amended independent claim 176, Applicants claim:

**176.** A method executed by a server of presenting questions of a predetermined subject matter that are submitted by at least one of a plurality of users to at least two experts on the predetermined subject matter, the questions being submitted via one of a plurality of client interfaces, each of the plurality of client interfaces being identified to the users as a forum on the predetermined subject matter of the forum, and the forum presenting at the least two experts as experts on the corresponding subject matter, the method comprising the steps of:

the server receiving a question submitted by one of the plurality of users via one of the plurality of client interfaces identified as a forum;

the server routing the submitted question for presentation to the one expert;

the server presenting the question to the one expert via one of a plurality of personal expert interfaces, each personal expert interface being uniquely associated with one of the at least two experts and in communication with the server; and

the server receiving a command via the personal expert interface of the one expert, the received command including an instruction for the server to route the question to another one of the at least two experts via a personal expert interface of the other expert.

(Emphasis added)

Applicants submit that neither Dworkin nor any of the other cited references, either alone or in combination, teach or suggest Applicants' method as claimed in amended independent claim 176. Specifically, and as essentially argued above with reference to amended independent claim 141, none of the cited references teach or suggest a method by which a question initially directed to a first expert can be directly referred to another expert by the first expert, by means of a command issued from a personal expert interface of the first expert.

Accordingly, Applicants respectfully submit that amended independent claim 176 is not made obvious by any combination of the cited references, and stands in condition for allowance. As claims 7, 131, 155, 170, 171, 177, 178, 186, 190, 192, and 192 each depend from allowable independent claim 176, Applicants further submit that dependent claims 7, 131, 155, 170, 171, 177, 178, 186, 190, 192, and 192 are also allowable for at least this reason.

In amended independent claim 194, Applicants claim:

**194.** A method executed by a server for providing answers from an expert via at least two client interfaces, each of the at least two client interfaces identified to users as a forum on a predetermined subject matter of the forum, whereby one or more users may choose to visit a forum, the expert being presented simultaneously in each of the at least two of the forums, the method comprising the steps of:

receiving at the server at least two questions, one of the at least two questions being submitted via each of the at least two forums in which the expert is simultaneously presented;

routing the at least two questions to the expert via the server;

presenting the at least two questions to the expert by means of a personal expert interface, wherein the personal expert interface is uniquely associated with the expert,

receiving at least two commands at the server via the personal expert interface of the expert, wherein a first one of the at least two commands includes a first answer to a first one of the questions submitted from one of the at least two forums and a first instruction instructing the server to post the first answer, and the second one of the at least two commands includes a second answer to a second one of the questions submitted from another one of the at least two forums and a second instruction instructing the server to post the second answer.

(Emphasis added)

Applicants submit that neither Dworkin nor any of the other cited references, either alone or in combination, teach or suggest Applicants' method as claimed in amended independent claim 194. Specifically, and as essentially argued previously with reference to amended independent claim 98, Applicants submit that Dworkin and the other cited references fail to teach or suggest Applicants' claimed method for receiving questions from at least two different forums in which an expert is simultaneously represented, presenting the questions from the two different forums to the expert by means of a personal expert interface uniquely associated with the expert, and receiving commands from the personal expert interface to post answers to the questions received from the two different forums.

As noted above in the discussion relating to amended independent claim 98, the Examiner maintains that Dworkin does in fact teach a method allowing users to submit questions to an expert via different forums. Applicants here again in part repeat their arguments for concluding that Dworkin teaches a method directed only to a single forum:

The Examiner suggests ... that each distinct web page in Dworkin's system (for example, as illustrated by Dworkin's FIGs. 7, 8 and 9) constitutes a distinct forum. As this position is at odds with both Applicants' and Dworkin's disclosed definitions for forums, Applicants respectfully disagree.

Applicants define a forum as a device "enabling users to present questions and to view questions and answers relating to [a] predetermined subject matter of the forum." (see, e.g., Applicants' claim 1). Similarly, Dworkin compares a forum to a "computerized bulletin board [ ], in which users post technical questions, and in which those questions may be answered by one or more expert respondents, and/or by other users." (see, e.g., Col. 3: 3 - 7 of Dworkin). With reference to FIG. 3, Dworkin illustrates a "Medical Expert's Group Forum" providing expert information relating to for example the medical field.. This example by Dworkin is clearly congruent with Applicants' definition of a forum.

... Dworkin nowhere discloses or suggests a system in which the expert is provided with a personal expert interface that facilitates communication with more than one forum. For example, the web pages illustrated by FIGs. 8 and 9 of Dworkin are each accessed from the web page of FIG. 7, which includes a button for returning to the "forum home page." Clearly, according to each of Applicants' and Dworkin's apparent definitions, all of the web pages illustrated by FIGs. 7 - 9 are in fact part of a single forum.

As essentially argued above, Applicants submit that neither Dworkin, nor any of the other cited references, teach or suggest a question/answer system in which the expert is provided with a means for receiving answers from more than one forum. Accordingly, Applicants respectfully submit that amended independent claim 194 is not made obvious by any combination of the cited references, and stands in condition for allowance. As claims 202 and 203 each depend from allowable independent claim 98, Applicants further submit that dependent claims 202 and 203 are also allowable for at least this reason.

### **III. New Claims**

Applicants add new claims 216 - 220. Claims 217 and 218, claim 219 and claim 220 respectively depend from allowable claims 176, 1 and 98. Applicants respectfully submit that claims 217 - 220 are therefore allowable for at least this reason.

In amended independent claim 216, Applicants claim:

**216. (new)** A method, executed by a server, for an expert to provide answers to questions presented by a plurality of users, the users communicating with the server via a plurality of client interfaces, each of the client interfaces being

identified to the users as a forum on a predetermined subject matter of the forum, the forum enabling users to present questions and to view questions and answers relating to the predetermined subject matter of the forum, the method comprising the steps of:

the server generating at least two forums;

the server receiving a question presented by a user accessing a first one of the at least two forums;

the server posting the question in a location on the server accessible to the expert;

the server presenting the question to the expert via a personal expert interface uniquely associated with the expert, and on which the question is displayed for the expert to answer;

receiving at the server a command via the personal expert interface from the expert in response to the question, wherein the command includes an answer for responding to the question and an instruction, wherein the instruction instructs the server to post the answer to the first forum accessed by the user to present the question and to at least a second one of the at least two forums, at which the question was not presented by the user.

(Emphasis added)

Applicants submit that neither Dworkin nor any of the other cited references, either alone or in combination, teach or suggest Applicants' method as claimed in new independent claim 216. Specifically, and as essentially argued previously with reference to amended independent claims 98 and 194, Applicants submit that Dworkin and the other cited references fail to teach or suggest Applicants' claimed method for receiving a command at a server to post an answer to a question in each first and second forums, where the second forum is a forum other than the forum at which the question was presented by the user. For at least this reason, Applicants respectfully submit that new claim 216 is not made obvious by the cited references, and is therefore allowable.

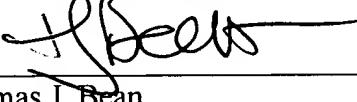
## CONCLUSION

Therefore, in view of the above amendments and remarks, it is respectfully requested that a Notice of Allowance as to all pending claims be issued in this case.

If there are any other issues remaining which the Examiner believes could be resolved through either a Supplemental Response or an Examiner's Amendment, the Examiner is respectfully requested to contact the undersigned at the telephone number indicated below.

Dated: September 25, 2006

Respectfully submitted,

By   
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